

Dockets Management Branch
The Food And Drug Administration
Department of Health and Human Services
Room 1-23
12420 Parklawn Drive
Rockville, Md. 20857

June 16, '99

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Gentlemen:

I am writing in support of the petition submitted last month by the Environmental Health Network (EHN) to have Calvin Klein's Eternity eau de parfum declared misbranded and ordered withdrawn from public sale. I trust that FDA will approve this petition in light of regulations 21CFR Sec. 740.1, 21CFR sec. 740.2 and 21CFR Sec. 740.10.

Despite the fact that Eternity contains ingredients shown to be toxic, Calvin Klein has failed to demonstrate, as Regulation 21CFR Sec. 740.10, stipulates, that each ingredient shall be adequately substantiated for safety prior to marketing. As regulations require, any such ingredient or product whose safety is not adequately substantiated is legally misbranded. Calvin Klein has broken the law by failing to publish on the package containing Eternity in the principal display panel, this statement:

"Warning --- the safety of this product has not been determined."

I hereby request that you hold Calvin Klein immediately accountable for non-compliance with the law of the land.

My daughter, Lizbeth Ann Glickman, a victim of toxic chemicals since first exposure six years ago, is unable to participate in life as you and I know it, as chemical "triggers", including perfumes, hold her hostage, forcing her to live in a special environment, and earn her living by working from her home. She cannot go into a store, an office, a synagogue, without encountering toxins in the environment] that can send her to the emergency room of the nearest hospital, gasping for breath.

Recently she joined a local synagogue, hoping that she could somehow partake of the slice of life offered. But the first visit sent her out choking for breath with a violent asthma attack as she encountered perfumes worn by congregants. Petitioning the rabbi to request voluntary restraint in the use of perfumes by his congregants met with a deaf ear at the time.

May I take the liberty of suggesting that you ask Calvin Klein owners these pertinent questions:

1. Does Eternity contain additives with parabens?
2. Does Eternity contain a compound with Quaternium 15?
3. Does Eternity contain a compound with methanamine or hexamine?
4. Does Eternity contain a compound with troysan 174?

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6. Has Eternity been tested for specific IgE antibodies?

6. Does Eternity contain inert ingredients?

Why are these questions important? An affirmative to any of the above should be grounds for immediate and thorough investigation, and declaration of Eternity as a misbranded product subject to immediate recall. Why? Because a "yes" answer identifies the additive, or the compound, as a substance that is directly or indirectly carcinogenic.

There are products that have gone on the market which are killing off people. It would be a horrendous failure on your part if this proved to be the case with a misbranded perfume.

This is a desperate situation, calling for firm and direct action by the FDA.

Sincerely,

A handwritten signature in cursive script, appearing to read "Harold Glickman".

Harold Glickman
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